

# **EXHIBIT 'A'**

**THE UNITED STATE DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

George Perrot,	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 1:18-CV-10147
	)	
Thomas Kelly, et al	)	
Defendants	)	
	)	


**AFFIDAVIT OF MEGAN J. LANDRY**

I, Megan J. Landry, on oath, hereby depose and state:

1. I am employed as a paralegal in the law department for the City of Springfield, MA.
2. I researched information on the cost of tolls and the distance from Springfield, MA to Boston, MA through publicly available resources. Specifically, information on the tolls was obtained from the MassDOT EZ Drive Toll Collector website. Information on the distance from Springfield to Boston was obtained through Google Maps.
3. I obtained the information on the mileage reimbursement rate for City of Springfield employees from the City of Springfield personnel department.
4. Based upon my review of publicly available information, I can state: The Boston Division is approximately 90 miles from Springfield. The access road is a toll road costing approximately: \$10.90 (with a MA EZ Pass), \$23.25 (without an EZ Pass) and \$12.15 (with an out of state EZ Pass) round trip in addition to fuel charges. For City of Springfield employees the City reimburses mileage at the Internal Revenue rate, which is currently \$0.54/mile. Each Springfield employee, witness or party that must appear in

Boston, whether for deposition or trial, will thus cost the City of Springfield between \$81.00 - \$100.00+/- for mileage, fuel and tolls, depending on the current fuel rates at the time and the type of vehicle driven.

SIGNED under penalty of perjury this 3<sup>rd</sup> day of October, 2018.

  
Megan J. Landry